

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CRYSTALLEX INTERNATIONAL CORP.,)
)
Plaintiff,)
)
v.) Misc. No. 17-151-LPS
)
BOLIVARIAN REPUBLIC OF)
VENEZUELA,)
)
Defendant.)

DEADLINES FOR BRIEFING AND DISCOVERY

Robert B. Pincus, in his capacity as special master for the United States District Court for the District of Delaware in the above-captioned case (the “**Special Master**”),¹ has met and conferred with the relevant parties and respectfully submits this schedule in accordance with the Court’s June 6, 2025 Oral Order, D.I. 1793.

Event	Special Master’s Proposed Deadline
Deadline for the Special Master to submit his Final Recommendation	Wednesday, July 2 (“Rec”)
Deadline to serve written discovery on the party (or parties) whose bid is selected as the Final Recommendation	Monday, July 7 (Rec + 5 days)
Opening expert reports due	Monday, July 7 (Rec + 5 days)

¹ All capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the *Sixth Revised Proposed Order (A) Establishing Sale and Bidding Procedures, (B) Approving Special Master’s Report and Recommendation Regarding Proposed Sale Procedures Order, (C) Affirming Retention of Evercore as Investment Banker by Special Master and (D) Regarding Related Matters* (D.I. 481) (the “**Sale Procedures Order**”).

² This proposed schedule reflects the Special Master’s best efforts to take into account the various, and at times competing, views expressed by the relevant parties, as well as the Court’s instruction that “discovery shall be minimal.”

Event	Special Master's Proposed Deadline
Deadline for the filing of any objections to the Special Master's Final Recommendation ³	Wednesday, July 9 (Rec + 7 days)
Deadline for any Competing Objector to disclose its own bid materials (such materials to be commensurate with those disclosed by the Special Master of the recommended bid) ⁴	Wednesday, July 9 (Rec + 7 days)
Deadline to serve written discovery on a Competing Objector	Friday, July 11 (Rec + 9 days)
Deadline to serve responses and objections for discovery requests served after the Final Recommendation	Tuesday, July 15 (Rec + 13 days)
Deadline to meet and confer regarding the scope of discovery to be produced in response to discovery requests served after submission of the Final Recommendation	Wednesday, July 16 (Rec + 14 days)
Deadline to serve witness disclosures pursuant to FRCP 26(a)(3)	Friday, July 18 (Rec + 16 days)
Deadline to notice witness depositions	Monday, July 21 (Rec + 19 days)
Deadline to serve responsive expert reports	Monday, July 21 (Rec + 19 days)
Deadline to complete document productions in response to discovery requests served before the submission of the Final Recommendation and substantially complete document productions in response to discovery requests served after the submission of the Final Recommendation	Tuesday, July 22 (Rec + 20 days)

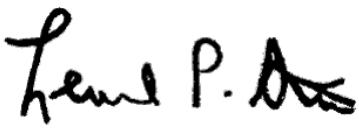
³ Because this deadline comes before the deadline for document productions, a party does not, merely by failing to cite a document to which the receiving party otherwise did not have access, waive the ability to reference that document in a reply brief, nor waive the right to make an objection at the Sale Hearing based on that document. For the avoidance of doubt, this footnote does not preclude a party from objecting to another party's invocation of or reliance on any document for any reason.

⁴ A Competing Objector is any party objecting to the Final Recommendation on the basis that its bid should have been selected as the Final Recommendation instead.

Event	Special Master's Proposed Deadline
Deadline to serve reply expert reports, if any	Friday, July 25 (Rec + 23 days)
Conclusion of the discovery period	Thursday, July 31 (Rec + 29 days)
Deadline for the filing of responses to objections to the Special Master's Final Recommendation	Friday, August 1 (Rec + 30 days)
Deadline for the filing of replies regarding any objections to the Special Master's Final Recommendation	Friday, August 8 (Rec + 37 days)
Deadline for the filing of sur-replies to replies regarding any objections to the Special Master's Final Recommendation (only to the extent new arguments are raised in reply briefing)	Tuesday, August 12 (Rec + 41 days)
Deadline for the Special Master to submit Joint Status Report ⁵	Wednesday, August 13 (Rec + 42 days)
Deadline to disclose exhibits pursuant to FRCP 26(a)(3)	Wednesday, August 13 (Rec + 42 days)
Deadline to serve objections to FRCP 26(a)(3) exhibit disclosures	Friday, August 15 (Rec + 44 days)
Commencement of the Sale Hearing	Monday, August 18 (Rec + 47 days)

So Ordered.

June 11, 2025
Wilmington, Delaware


Hon. Leonard P. Stark, U.S.D.J.

⁵ The Court previously ordered that the Special Master's Joint Status Report should include a witness list and allocation of time across parties. D.I. 1741 ¶ 3.